

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

R.K., et al.,)	
)	
Plaintiffs,)	No. 3:21-cv-00853
)	
v.)	Chief Judge Crenshaw
)	Magistrate Judge Frensley
GOVERNOR BILL LEE, et al.,)	
)	
Defendants.)	

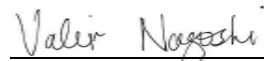
DECLARATION OF VALERIE NAGOSHINER

Pursuant to 28 U.S.C. § 1746, I, Valerie Nagoshiner, declare as follows:

1. My name is Valerie Nagoshiner. I am over eighteen years of age and am fully competent to testify to the statements herein.
2. I am the Chief of Staff at the Tennessee Department of Health. I have held this position since May 2016.
3. Pursuant to Tenn. Code Ann. § 14-4-101(a), the Commissioner of Health is in the process of promulgating emergency rules that will set forth criteria for isolating a person with a positive COVID-19 diagnosis.
4. The above-referenced emergency rules will set forth the process by which a person with a positive COVID-19 diagnosis shall be excluded from school property, including but not limited to busses, and school events.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 23, 2021.



Valerie Nagoshiner

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2021, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties as indicated below. Parties may access this filing through the Court's electronic filing system.

Brice M. Timmons
Bryce W. Ashby
Craig A. Edgington
Donati Law Firm LLP
brice@donatilaw.com
bryce@donatilaw.com
craig@donatilaw.com
Counsel for Plaintiffs

Jessica F. Salonus
The Salonus Firm, PLC
jsalonus@salonusfirm.com
Counsel for Plaintiffs

Justin S. Gilbert
Gilbert McWherter Scott Bobbitt PLC
justin@schoolandworklaw.com
Counsel for Plaintiffs

s/ Reed N. Smith
*Reed Smith, VA Bar No. 77334
Acting Assistant Attorney General
*Admitted Pro Hac Vice